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**From:** Crosby-Vega, Terri [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E439D8D14EAF4F8DA8661E95A3037052-CROSBY-VEGA, TERRI]  
**Sent:** 6/17/2016 12:44:59 PM  
**To:** Gerhard, Sasha [Gerhard.Sasha@epa.gov]  
**Subject:** RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

They are under the Air Rules.

How was the email? I tried to be nice but have justification that the report is required and should be part of their record when issuing the permit.

**Terri Crosby-Vega**  
**Environmental Engineer**  
USEPA Region 4  
Atlanta Federal Center 9T25  
61 Forsyth Street SW  
Atlanta, GA 30303  
**404-562-8497**

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**From:** Gerhard, Sasha  
**Sent:** Thursday, June 16, 2016 4:46 PM  
**To:** Crosby-Vega, Terri <Crosby-Vega.Terri@epa.gov>  
**Subject:** RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Oh, I like TDEC's rules! Are these under their air rules or RCRA?

Sasha Gerhard  
USEPA, Office of Resource Conservation & Recovery  
Program Implementation & Information Division, 5303P  
703-347-8964 (P)  
703-308-0509 (F)

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**From:** Crosby-Vega, Terri  
**Sent:** Thursday, June 16, 2016 2:58 PM  
**To:** Moe Baghernejad <Moe.Baghernejad@tn.gov>; Land, Eva <Land.Eva@epa.gov>  
**Cc:** Lippert, Kris <Lippert.Kristin@epa.gov>; Feely, Ken <Feely.Ken@epa.gov>; Gerhard, Sasha <Gerhard.Sasha@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>; Shuster, Kenneth <Shuster.Kenneth@epa.gov>; Gaines, Jeff <Gaines.Jeff@epa.gov>; Abdul-Malik, Norma <Abdul-Malik.Norma@epa.gov>  
**Subject:** RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Hi Moe,

Thank you for your information. However, I would like to challenge the statement that "it is a confidential document from the Army."

In accordance with TDEC 1200-3-4-.04(1)(h) an exception to open burning may be approved where "there is no other practical, safe, and/or lawful method of disposal. Documentation demonstrating why the general open burning regulations cannot be met must be submitted." TDEC 1200-3-4-.04(1)(k) also states that "Open burning conducted under this exception is only allowed where no other safe means of disposal exists." Furthermore TDEC 1200-3-4-.04 (2) states "The Technical Secretary reserves the right to require a person to cease or limit open burning if emissions from the fires are deemed by the Technical Secretary or his designee to jeopardize public health or welfare, create a public nuisance or safety hazard, create a potential safety hazard, or interfere with the attainment or maintenance of the air quality standards."

With the TDEC Rules, the document of the Army should be in support of the exceptions allowed in the Rules. If the Army wants to assert "Confidential Business Information" status upon submittal, we can examine the information to see if the confidential standards apply. If you have other information associated with Holston in support of the exceptions in the Rules, please send me a copy of that information.

Holston is one of many facilities that the EPA is looking at because of open burning. The EPA's Explosive Alternatives Disposal Team's mission is to "Explore ways to better manage certain explosive wastes and reduce contamination from open burning and open detonation operations."

Thank-you in assisting me with this information!  
Terri Crosby-Vega

**Terri Crosby-Vega**  
**Environmental Engineer**  
USEPA Region 4  
Atlanta Federal Center 9T25  
61 Forsyth Street SW  
Atlanta, GA 30303  
**404-562-8497**

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**From:** Moe Baghernejad [<mailto:Moe.Baghernejad@tn.gov>]  
**Sent:** Monday, June 13, 2016 10:49 AM  
**To:** Crosby-Vega, Terri <[Crosby-Vega.Terri@epa.gov](mailto:Crosby-Vega.Terri@epa.gov)>; Land, Eva <[Land.Eva@epa.gov](mailto:Land.Eva@epa.gov)>  
**Cc:** Lippert, Kris <[Lippert.Kristin@epa.gov](mailto:Lippert.Kristin@epa.gov)>; Feely, Ken <[Feely.Ken@epa.gov](mailto:Feely.Ken@epa.gov)>  
**Subject:** RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

I do not have it. I just spoke with Jimmy Ogle from HAAP. He said "it is confidential document from Army ". He will respond to me after he talk to them.

Thanks  
Moe Baghernejad



Moe Baghernejad | TDEC- Environmental Protection Specialist  
Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower, 15<sup>th</sup> Floor  
312 Rosa L. Parks Avenue  
Nashville, Tennessee 37243  
615-532-0594  
[Moe.baghernejad@tn.gov](mailto:Moe.baghernejad@tn.gov)  
<http://www.tn.gov/environment/air.shtml>  
Tell us how we're doing. [Take our TDEC customer service survey.](#)

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**From:** Crosby-Vega, Terri [<mailto:Crosby-Vega.Terri@epa.gov>]  
**Sent:** Monday, June 13, 2016 7:10 AM  
**To:** Land, Eva; Moe Baghernejad  
**Cc:** Lippert, Kris; Feely, Ken  
**Subject:** RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

\*\*\* This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. \*\*\*

I was wondering if you have a copy of the following document. Do you know if it was sent to EPA? I am looking for a copy of the document. Any information that you have would be helpful.

"Alternative Treatment Options for Open Burning of Explosive Waste at Holston Army Ammunition Plant, (ERDC/EL TR-12-8), March 2012."

Thanks!  
Terri

**Terri Crosby-Vega**  
**Environmental Engineer**  
USEPA Region 4  
Atlanta Federal Center 9T25  
61 Forsyth Street SW  
Atlanta, GA 30303  
404-562-8497

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**From:** Land, Eva  
**Sent:** Monday, May 23, 2016 2:06 PM  
**To:** Feely, Ken <[Feely.Ken@epa.gov](mailto:Feely.Ken@epa.gov)>  
**Cc:** Crosby-Vega, Terri <[Crosby-Vega.Terri@epa.gov](mailto:Crosby-Vega.Terri@epa.gov)>; Lippert, Kris <[Lippert.Kristin@epa.gov](mailto:Lippert.Kristin@epa.gov)>  
**Subject:** RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Ken,

I will raise this comment. I have a few things in front of this one, but I'll send out my draft comments once I have everything all together.

Eva

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**From:** Feely, Ken  
**Sent:** Monday, May 23, 2016 9:03 AM  
**To:** Land, Eva <[Land.Eva@epa.gov](mailto:Land.Eva@epa.gov)>  
**Cc:** Crosby-Vega, Terri <[Crosby-Vega.Terri@epa.gov](mailto:Crosby-Vega.Terri@epa.gov)>; Lippert, Kris <[Lippert.Kristin@epa.gov](mailto:Lippert.Kristin@epa.gov)>  
**Subject:** RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Eva,

Is it still your intent to seek the addition of a specific prohibition on the open burning of PCBs in the new permits?

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**Ken Feely** | EPA Region 4 | Resource Conservation & Restoration Division  
Regional PCB Program Coordinator/Team Lead  
USEPA Region 4 | Atlanta Federal Center 9T25  
61 Forsyth Street SW | Atlanta GA 30303-8960  
O: 404.562.8512 | F: 404.562.9964 | M: 470.725.7929  
[feely.ken@epa.gov](mailto:feely.ken@epa.gov)

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**From:** Land, Eva  
**Sent:** Friday, May 20, 2016 2:35 PM  
**To:** Gala, Chetan <[Gala.Chetan@epa.gov](mailto:Gala.Chetan@epa.gov)>; Russo, Todd <[Russo.Todd@epa.gov](mailto:Russo.Todd@epa.gov)>; Feely, Ken <[Feely.Ken@epa.gov](mailto:Feely.Ken@epa.gov)>; Powell, Keri <[Powell.Keri@epa.gov](mailto:Powell.Keri@epa.gov)>; Ceron, Heather <[Ceron.Heather@epa.gov](mailto:Ceron.Heather@epa.gov)>  
**Subject:** Fw: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Hello Again,

There are apparently two title V permits for this facility. The two permits are in different counties. If you have any comments please let me know by 6/17 on this one as well.

Thanks for your help.

Eva

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**From:** Moe Baghernejad <[Moe.Baghernejad@tn.gov](mailto:Moe.Baghernejad@tn.gov)>  
**Sent:** Friday, May 20, 2016 2:03 PM  
**To:** Land, Eva  
**Subject:** Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

### **“Concurrent Review Requested”**

Dear Ms. Land:

Enclosed for your information is a copy of the Division's draft major source (Title V) operating permit renewal, the public notice and statement of basis for:

Holston Army Ammunition Plant  
BAE Systems Ordnance Systems Inc.  
4509 West Stone Drive  
Kingsport, TN 37660

This notice was placed in the legal section of the Kingsport Times-News on May 18, 2016. You are invited to review and comment. You agreed to treat this draft permit as a proposed permit and to perform your 45-day review concurrently with the Public Notice period.

If you have any questions or comments concerning this source, please contact Moe Baghernejad at (615)532-0594 or via email at [moe.baghernejad@tn.gov](mailto:moe.baghernejad@tn.gov).

Thanks  
Moe Baghernejad



Moe Baghernejad | TDEC- Environmental Protection Specialist  
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